

No. 20-55770

**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

TIMOTHY ROBBINS, et al.,
Respondents-Appellants,

v.

ALEJANDRO RODRIGUEZ, et al.,
Petitioners-Appellees.

On Appeal from the United States District Court, Central District of California
No. CV 07-3239-TJH (RNB)

**JOINT MOTION FOR 90 DAY EXTENSION TO FILE PETITION FOR
PANEL REHEARING OR REHEARING EN BANC**

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The parties respectfully request that this Court extend the deadline to file the Petition for Panel Rehearing or Rehearing En Banc (PFR/EB) by 90 days to afford the parties time to explore settlement negotiations. The Court granted the parties' three prior requests for an extension of the PFR/EB deadline.

The Memorandum in this Case was issued on October 19, 2021 (ECF 30). The parties first requested an extension from this Court on November 9, 2021, which was granted on November 10, 2021 (ECF 32). The parties submitted a second request for an extension on March 1, 2022, which the Court granted on March 21, 2022 (ECF 35). The parties submitted a third request for an extension on May 4, 2022, which the Court on May 25, 2022 (ECF 37). The current due date for the PFR/EB is August 30, 2022. The parties respectfully request that the due date be extended by 90 days to November 28, 2022.

Good cause exists for this request. As previously disclosed to this Court, the parties agreed to mediate this matter under the supervision of a federal magistrate judge. The first formal mediation session was scheduled for April 26, 2022. However, due to illness, the magistrate judge was forced to reschedule the conference. The rescheduled mediation took place on June 21, 2022. The parties have agreed to continue settlement negotiations, and Defendants are scheduled to provide an update on their position to Petitioners and the mediator by September 6, 2022.

Given the important interests at stake and the complexity of the issues for consideration, the parties require additional time to determine whether a settlement can be reached. A potential settlement may resolve all, or parts, of Petitioners' claims, including to the relief at issue in this appeal. As such, the parties agree that judicial economy would be best served by continuing to engage in settlement negotiations.

For the foregoing reasons, the parties respectfully request that the deadline to file the Petition for Panel Rehearing or Rehearing En Banc be extended by 90 days. The parties will notify the Court if any additional extensions are warranted because settlement discussions are ongoing.

Respectfully submitted,

Dated: August 24, 2022

s/ Michael Kaufman
MICHAEL KAUFMAN
Counsel for Petitioners-Appellees

Dated: August 24, 2022

s/ Sarah Wilson (with permission)
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